

1 William A. Markham, California State Bar No. 132970
Dorn Graham Bishop, California State Bar No. 147994
2 Jason Eliaser, California State Bar No. 248394
LAW OFFICES OF WILLIAM A. MARKHAM, P.C.
3 550 West C Street, Suite 2040
San Diego, CA 92101

4 Tel: (619) 221-4400
5 Fax: (619) 224-3974
E-mail: wm@markhamlawfirm.com

6 Attorneys for Defendants Kevin Attiq and Fadi Attiq
7

8
9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF NEW YORK
11

12 INNOVATION VENTURES, LLC et al.

13 Plaintiffs.

14 Vs.
15

16 ULTIMATE ONE DISTRIBUTING
CORP., et al.,

17 Defendants
18
19

Case No. 12-CV-05354-KAM-RLM

NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

The Hon. Kiyo A. Matsumoto

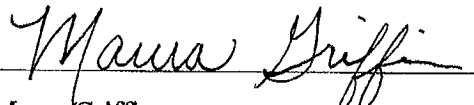
20
21
22
23
24
25
26
27
28
NOTICE OF MOTION

1
2 TO: Opposing Counsel (see attached addresses and email addresses)
3

4 PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this
5 motion and the Certificate of Good Standing annexed thereto we will move this Court pursuant to
6 Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern
7 Districts of New York for an Order allowing the admission of movant, an affiliated member of the
8 firm of The Law Offices of William A. Markham, P.C., as attorney pro hac vice to argue or try this
9 case in whole or in part as counsel for Defendants Kevin Attiq and Fadi Attiq There are no pending
10 disciplinary proceedings against me in any State or Federal court.
11

12 Respectfully submitted,
13

14
15 Dated: 3/22/13


16 Maura Griffin

17 LAW OFFICES OF WILLIAM A. MARKHAM, P.C.
18 550 West C Street, Suite 2040
19 San Diego, CA 92101
20 wm@markhamlawfirm.com
21 (619) 221-4400
22
23
24
25
26
27
28

Attachment "A"

Addresses for Attorneys of Record	Party Represented
Brian M. Akkashian Paesano Akkashian, PC 132 N Old Woodward Ave Birmingham, MI 48009 248-792-6886 248-792-6885 (fax) bakkashian@paesanoakkashian.com	JT Wholesale, Inc Midwest Wholesale Distributors Trimexico Inc. Justin Shayota Raid Jamil Walid Jamil
Richard Apkarian, Jr. Paesano Akkashian 132 N Old Woodward Ave Birmingham, MI 48009 248-792-6886 248-792-6885 (fax) rapkarian@paesanoakkashian.com	JT Wholesale, Inc Midwest Wholesale Distributors Trimexico Inc. Justin Shayota Raid Jamil Walid Jamil

1 2 3 4 5 6 7 8 9 10	Michael Barton Plunkett Cooney 38505 Woodward Ave Suite 2000 Bloomfield Hills, MI 48304 248-901-4070 248-901-4040 (fax) mbarton@plunkettcooney.com	Universal Wholesale, Inc. Joseph Sevany
11 12 13 14 15 16 17 18	Jess M. Berkowitz Jess M. Berkowitz 401 Broadway, Suite 1510 New York, NY 10013 212-431-4453 212-431-4471 (fax) jessberkowitzesq@aol.com	Delta Distribution Services Corp. Sulaiman S. Aamir Empire Trade Wholesaler Corp.
19 20 21 22 23 24 25 26 27	Andre K. Cizmarik Edwards Wildman Palmer LLP 750 Lexington Avenue New York, NY 10022 212-308-4411 888-325-9598 (fax) acizmarik@edwardswildman.com	Quality King Distributions, Inc.

1 2 3 4 5 6 7 8 9	Michelle Waller Cohen Patterson Belknap Webb & Tyler LLP 1133 Avenue Of The Americas New York, NY 10036 212-336-2758 212-336-1235 (fax) mcohen@pbwt.com	Innovation Ventures, LLC Living Essential, LLC International IP Holdings LLC
10 11 12 13 14 15 16 17	Timothy Connaughton Vandever Garzia 1450 West Long Lake, Ste 100 Troy, MI 48098 248-312-2916 248-267-1242 (fax) tconnaughton@vgpclaw.com	Capital Sales Company, Ltd
18 19 20 21 22 23 24 25 26	Bridget Anne Crawford Cowan Liebowitz & Latman PC 1133 Avenue Of The Americas New York, NY 10036 212-790-9200 212-575-0671 (fax) bac@cll.com	Elegant Trading, Inc Ahmed Bhimani

<p>Brian J. Davis</p> <p>Law Office of Brian J. Davis</p> <p>400 Garden City Plaza</p> <p>Suite 450</p> <p>Garden City, NY 11530</p> <p>516-542-0249</p> <p>516-542-0259 (fax)</p> <p>ah@bjdpc.com</p>	<p>Shah Distributors, Inc</p>
<p>Danielle Marie Defilippis</p> <p>Norris McLaughlin & Marcus, PA</p> <p>875 Third Avenue</p> <p>8th Floor</p> <p>New York, NY 10022</p> <p>212-808-0700</p> <p>212-808-0844 (fax)</p> <p>dmdefilippis@nmmlaw.com</p>	<p>Midwest Wholesale Distributors</p> <p>Justin Shayota</p> <p>Walid Jamil</p> <p>JT Wholesale, Inc</p> <p>Trimexico Inc.</p> <p>Raid Jamil</p>
<p>Daniel Jason DiMuro</p> <p>Gordon & Rees LLP</p> <p>18 Columbia Turnpike Suite 220</p> <p>Florham Park, NJ 07932</p> <p>973-549-2500</p> <p>ddimuro@gordonrees.com</p>	<p>MCR Innovations and Packaging, Inc.</p> <p>MCR Printing and Packaging Corp</p> <p>Camilo Ramirez</p> <p>Mario Ramirez</p> <p>Naftaunited.com</p>

1	Ronald A. Giller	MCR Innovations and Packaging, Inc.
2		
3	Gordon & Rees LLP	MCR Printing and Packaging Corp
4	90 Broad Street	Camilo Ramirez
5	23rd Floor	Mario Ramirez
6	New York, NY 10004	Naftaunited.com
7	212-269-5500	
8	212-269-5505 (fax)	
9	rgiller@gordonrees.com	
10		
11	Joseph P. Goldberg	Brothers Trading Co., Inc. d/b/a
12	Hodgson Russ LLP	Victory Wholesale Grocers
13	1540 Broadway, 24th Floor	
14	New York, NY 10036	
15	(212) 751-4300	
16	(212) 751-0928 (fax)	
17	jgoldberg@hodgsonruss.com	
18		
19		
20	Zachary S. Goldberg	Steerforth Trading, Inc
21	Goldberg, Corwin & Greenberg, LLP	Isaac Anzaroot
22	331 Madison Avenue, 15th Floor	
23	New York, NY 10017	
24	212-986-1000	
25	212-986-8039 (fax)	
26	zgoldberg@gcgllp.com	
27		
28		

Stanley R. Goodman

Goodman & Saperstein, Esqs.

100 Garden City Plaza

Suite 412B

Garden City, NY 11530

(516) 227-2100

gsesq600@aol.com

Food Distributers International, Inc

Scott Tilbrook

Purity Wholesale Grocers, Inc.

Natasha Sardesai Grant

Kenyon & Kenyon LLP

1 Broadway

New York, NY 10004

212-908-6851

212-425-5288 (fax)

nsardesai@kenyon.com

CVS Caremark Corp.

David M. Greeley

Seltzer Caplan McMahon Vitek

750 B Street

Suite 2100

San Diego, CA 92101

619-685-3150

619-702-6893 (fax)

greeley@scmv.com

Tradeway International, Inc. d/b/a

Baja Exporting

Adriana Shayota

Joseph Shayota

<p>Todd D. Greenberg</p> <p>Addabbo & Greenberg</p> <p>118-21 Queens Blvd.</p> <p>Suite 306</p> <p>Forest Hills, NY 11375</p> <p>718-268-0400</p> <p>718-575-9869 (fax)</p> <p>todd@queenslaw.com</p>	<p>Price Master Corp.</p> <p>Ultimate One Distributing Corp.</p> <p>Abdul Satar Najimi</p> <p>Gulam Najimi</p> <p>Wally Najimi</p>
<p>Hara K. Jacobs</p> <p>Ballard Spahr</p> <p>1735 Market St</p> <p>51st Floor</p> <p>Philadelphia, PA 19103</p> <p>215-864-8209</p> <p>215-864-8999 (fax)</p> <p>jacobsh@ballardspahr.com</p>	<p>Valero Retail Holdings, Inc.</p>
<p>J. Christopher Jensen</p> <p>Cowan, Liebowitz & Latman, P.C.</p> <p>1133 Avenue of the Americas</p> <p>New York, NY 10036-6799</p> <p>212-790-9200</p> <p>jcj@cll.com</p>	<p>Elegant Trading, Inc</p> <p>Ahmed Bhimani</p>

Gregory Charles Johnson Katten Muchin Rosenman LLP 575 Madison Avenue New York, NY 10022 212-940-6599 gregory.johnson@kattenlaw.com	Universal Wholesale, Inc. Joseph Sevany
Brian A. Kalman London Fischer, LLP. 59 Maiden Lane New York, NY 10038 212-972-1000 212-972-1030 (fax) bkalman@londonfischer.com	Capital Sales Company, Ltd
Jonah Moses Knobler Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036 212-336-2134 212-336-2848 (fax) jknobler@pbwt.com	Innovation Ventures, LLC Living Essential, LLC

John Ko John Y. Ko, Attorney at Law 1855 W Katella Ave Suite 365 Orange, CA 92867 714-771-5875 714-771-2689 (fax) jkcellistlawyer@gmail.com	Moa Trading, Inc David K Lee
Stephen J. Kressel Kressel, Rothlein, Walsh & Roth LLC 684 Broadway Massapequa, NY 11758 516-798-5363 516-798-5498 (fax) s.kressel@krwrlaw.com	Excel Wholesale Distributors, Inc.
Thomas Philip Kurland Patterson Belknap Webb & Tyler 1133 Avenue Of The Americas New York, NY 10036 (212)336-2000 (212)336-2222 (fax) tkurland@pbwt.com	Innovation Ventures, LLC Living Essential, LLC

Jason Joseph Lavery Callen Koster Brady & Brennan 1 Whitehall Street New York, NY 10004 (212)248-8800 (212)248-6815 (fax) jlavery@ckbbllaw.com	Richmond Wholesale Company, Inc. Saquib Khan
Stephen M. Lobbin The Eclipse Group LLP 2020 Main Street Suite 600 Irvine, CA 92614 949-851-5000 949-851-5051 (fax) sml@eclipsegrp.com	Juan Romero Gutierrez Advanced Nutraceutical Manufacturing, LLC Nutrition Private Label, Inc.
J. Bruce Maffeo Cozen O'Connor 277 Park Avenue 20th Floor New York, NY 10172 212-883-4951 212-937-5202 (fax) jbmaffeo@cozen.com	Baja Exporting, LLC Joseph Shayota

Chiara Mattieson Plunkett Cooney 38505 Woodward Ave Ste 2000 Bloomfield Hills, MI 48304 248-901-4000 248-901-4040 (fax) cmattieson@plunkettcooney.com	Universal Wholesale, Inc. Joseph Sevany
Megan P. McKnight Plunkett Cooney 38505 Woodward Ave Suite 2000 Bloomfield Hills, MI 48304 248-901-4000 248-901-4040 (fax) mmcknight@plunkettcooney.com	Universal Wholesale, Inc. Joseph Sevany
Jane Metcalf Patterson Belknap Webb & Tyler LLP 1133 Avenue of the Americas New York, NY 10036-6710 212-336-2000 jmetcalf@pbwt.com	Innovation Ventures, LLC Living Essential, LLC

Alexander Michaels Patterson Belknap Webb & Tyler 1133 Avenue of the Americas New York, NY 10036 212-336-2904 amichaels@pbwt.com	Innovation Ventures, LLC Living Essential, LLC
Vincent A. Nagler Callan, Regenstreich, Koster & Brady One Whitehall Street New York, NY 10004 (212) 248-8800 212-248-6815 (fax) vnagler@ckbbllaw.com	Richmond Wholesale Company, Inc. Saquib Khan
Leslie Nizin Leslie Nizin 125-10 Queens Blv'd Kew Gardens, NY 11415 718-263-2411 718-263-2911 (fax) lnizin@aol.com	Top Choice Trading USA, Inc.

Anthony R. Paesano Paesano Akkashian, PC 132 N Old Woodward Avenue Birmingham, MI 48009 (248)792-6886 (248)792-6885 (fax) apaesano@paesanoakkashian.com	JT Wholesale, Inc Midwest Wholesale Distributers Trimexico Inc. Justin Shayota Raid Jamil Walid Jamil
Ariel Samuel Peikes Gottlieb, Rackman & Reisman PC 270 Madison Avenue 8th Floor New York, NY 10016 212-684-3900 212-684-3999 (fax) apeikes@grr.com	Baseline Distribution, Inc David Flood
Stanton L. Phillips Law office of Stanton Lee Phillips 433 N Camden Dr Ste, 970 Suite 970 Beverly Hills, CA 90210 310-859-9900 310-859-7788 (fax) stan@slphillipsllaw.com	One Stop Label Corporation

Geoffrey Potter Patterson Belknap Webb & Tyler LLP 1133 Ave of the Americas New York, NY 10036 212-336-2000 212-336-2222 (fax) gpotter@pbwt.com	Innovation Ventures, LLC Living Essential, LLC International IP Holdings LLC
Kathryn Quarles Seltzer Caplan McMahon Vitek 750 B Street, Suite 2100 San Diego, CA 92101 619-685-3014 619-702-6868 (fax) quarles@scmv.com	Tradeway International, Inc. d/b/a Baja Exporting Adriana Shayota Joseph Shayota
Bruce M. Sabados Katten Muchin Rosenman LLP 575 Madison Avenue New York, NY 10022 212-940-8800 212-940-8776 (fax) bruce.sabados@kattenlaw.com	Universal Wholesale, Inc. Joseph Sevany

Martin I. Saperstein Goodman & Saperstein, Esqs. 100 Garden City Plaza Suite 412B Garden City, NY 11530 516-227-2100 516-228-8120 (fax) gsesq600@aol.com	Food Distributers International, Inc Scott Tilbrook Purity Wholesale Grocers, Inc.
Richard S. Schurin Gottlieb, Rackman & Reisman, P.C. 270 Madison Avenue 8th Floor New York, NY 10016-0601 (212) 684-3900 212-684-3999 (fax) rschurin@grr.com	Baseline Distribution, Inc. David Flood
Howard J. Shire Kenyon & Kenyon One Broadway New York, NY 10004 212-908-6205 212-425-5288 (fax) hshire@kenyon.com	CVS Caremark Corp.

Zachary Winthrop Silverman Edwards Wildman Palmer LLP 750 Lexington Avenue New York, NY 10022 212-308-4411 212-308-4844 (fax) zsilverman@edwardswildman.com	Quality King Distributions, Inc
Randi Wolkenbreit Singer Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 212-310-8000 212-310-8007 (fax) randi.singer@weil.com	Core-Mark International, Inc.
David Benjamin Sunshine Cozen O'Connor 250 Park Avenue New York, NY 10177 212-986-1116 212-986-0604 (fax) dsunshine@cozen.com	Baja Exporting, LLC Joseph Shayota

James K. Thome Vandever Garzia, PC 1450 West Long Lake Road Suite 100 Troy, MI 48098 248-312-2800 248-267-1242 (fax) jthome@vgpclaw.com	Capital Sales Company, Ltd
James Renfro Thompson Seltzer Caplan McMahon Vitek 750 B Street, Suite 2100 San Diego, CA 92101 619-685-3049 619-702-6836 (fax) thompson@scmv.com	Adriana Shayota Joseph Shayota Tradeway International, Inc. d/b/a Baja Exporting
Jacquelyn Renee Trussell Hodgson Russ LLP 1540 Broadway 24th Floor New York, NY 10036 212-751-4300 212-751-0928 (fax) jtrussel@hodgsonruss.com	Brothers Trading Co., Inc. d/b/a Victory Wholesale Grocers

Gregory Vega Seltzer Caplan McMahon Vitek 750 B Street, Suite 2100 San Diego, CA 92101 619-685-3040 619-685-3100 (fax) vega@scmv.com	Adriana Shayota Joseph Shayota Tradeway International, Inc. d/b/a Baja Exporting
Anthony J. Viola Edwards Wildman Palmer LLP 750 Lexington Avenue New York, NY 10022-1200 212-912-2827 212-308-4844 (fax) aviola@edwardswildman.com	Quality King Distributions, Inc.
Elizabeth Nicole Warin Cozen O'Connor 45 Broadway 16th Floor New York, NY 10006 212-883-4969 212-509-9492 (fax) nwarin@cozen.com	Baja Exporting, LLC Joseph Shayota

Jeremy Alexander Weinberg Patterson Belknap Webb & Tyler LLP 1133 Avenue Of The Americas New York, NY 10036 212-336-2000 212-336-2222 (fax) jweinberg@pbwt.com	Innovation Ventures, LLC Living Essential, LLC
Christos George Yatrakis Patterson Belknap Webb & Taylor LLP 1133 Avenue of the Americas New York, NY 10036 212-336-2519 212-336-2222 (fax) cyatrakis@pbwt.com	Innovation Ventures, LLC Living Essential, LLC
Gordon J. Zuiderweg Law Offices of Barry K. Rothman 1901 Avenue Of The Stars Suite 370 Los Angeles, CA 90067 310-557-0062 310-557-9080 (fax) bkr@bkrlegal.com	Leslie Roman Flexopack Donna Roman

Arnold J. Hauptman

686 Broadway

Massapequa, NY 11758

(516) 541-7200

7-Eleven Store #11181

7-Eleven Store #23407)

7-Eleven Store #11152

7-Eleven Store #32760

7-Eleven Store #25449C-2422